



Testimony of Ashley Zane
Government Affairs Associate, CBIA
Before the Environment Committee
Hartford, CT
March 7, 2022
Testifying in Opposition to:

SB 238: AN ACT CONCERNING REVISIONS TO CERTAIN ENVIRONMENT RELATED STATUTES

My name is Ashley Zane and I am a Government Affairs Associate for the Connecticut Business and Industry Association. CBIA is Connecticut's largest business organization, with thousands of member companies, small and large, representing a diverse range of industries from across the state. Ninety-five percent of CBIA member companies have 100 or fewer employees.

I am here in strong opposition to SB 238, An Act Concerning Revisions to Certain Environment Related Statutes. Specifically, CBIA is opposed to Section 12 of the bill which would allow the Department of Energy and Environmental Protections to charge an annual fee for any general permit issued by the department after October 1, 2022.

Under current law, there is a registration fee, but no annual fee for entities filing for a general permit. For individual permits, there is an application fee and accompanying annual fees. Section 12 of this bill adds an annual fee in addition to the registration fee, essentially equating a general permit to an individual permit despite claims that general permits decrease the department's workload. This revenue grab will greatly increase costs for a wide range of entities including food processing, biofuel production, industrial laundries, beverage production, water treatment, printing and photographic, etc.

Additionally, Section 12 creates a fee range for the annual fees which may range up to \$1,000. This is a significant increase in costs on top of regulatory costs entities already pay. Companies that make up our E2 Council are made up of good actors that seek to be partners with the Department to protect human health and the environment. This translates to entities undertaking additional costs other than just the permitting fees. They continually monitor and sample production outputs, look to upgrade systems, hire specialists to evaluate their processes, and utilize technology in order to become more efficient and effective. Many of our companies

have done just that and become better stewards of the environment. Tying up more money in permitting fees could be better spent investing in cleaner and greener projects designed to be better environmental partners and help the state accomplish their environmental goals.

Connecticut is already known for its high cost of doing business and regulatory oversight. In some cases, it might be necessary for DEEP to collect additional samples to ensure compliance with the permitting standards in which additional resources may be needed by DEEP. In this instance we should look to other states who, in some instances, require the entity to cover the cost of the sampling. In many instances this cost would be less than or equivalent to the annual fees suggested in this punitive section.

CBIA strongly urges the Committee to remove Section 12 of SB 238 and I look forward to working with the committee throughout the session.